



Alan C. Lloyd, Ph.D.  
Agency Secretary  
Cal/EPA



## Department of Toxic Substances Control

5796 Corporate Avenue  
Cypress, California 90630



Arnold Schwarzenegger  
Governor

August 10, 2005

Mr. Matthew F. Letany, Director  
Environmental, Safety & Health  
Wyle Laboratories  
128 Maryland Street  
El Segundo, California 90245-4115

### CONDITIONAL APPROVAL OF PRESUMPTIVE REMOVAL ACTION WORK PLAN, NORCO, CA

Dear Mr. Letany:

The Department of Toxic Substances Control (DTSC) has reviewed Wyle Draft Presumptive Removal Action Work Plan (RAW) dated June 10, 2005 for soil gas at northwestern area. The RAW was submitted in response to DTSC comments dated June 23, 2005. DTSC comments were not satisfactorily and/or completely addressed. Enclosed, please find a Table that includes DTSC evaluation of Wyle's response.

In order to move project forward and address potential indoor air exposure in an expedited manner, DTSC hereby conditionally approves the RAW for public review provided Wyle complies with the comments below. DTSC provided these comments to Wyle via e-mail on July 19, 2005:


1. The proposed remedy should be implemented immediately after the final RAW is approved by DTSC. Wyle must not wait until the water levels decline as indicated in the response to DTSC's comments.
2. The RAW and the O&M Plan should include sampling regime to evaluate whether other homes on Goldenwest have a potential for exposure to indoor air. The sampling data will be useful for making a determination for expansion of soil vapor extraction system, if necessary.
3. Wyle should include the clarification in the O&M Plan with respect to how a decision will be made to determine whether RAW Remedial Action Objectives are met.

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A formal 30-day public comment period on the RAW starts on August 12, 2005 and ends on September 12 2005. The RAW will be placed in the designated information repositories, along with the enclosed Draft Notice of Exemption, for the required thirty-day public comment period. Upon conclusion of the formal public comment period, DTSC will consider all comments received prior to modifying and/or approving the RAW. Thereafter, Wyle should implement the RAW.

If you have any questions, please contact Mr. Rafat Abbasi, P.E., at (714) 484-5498 or me at (714) 484-5368.

Sincerely, 

 Shahir Haddad, P.E.  
Unit Chief  
Cypress Branch  
School Property Evaluation and Cleanup Division

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cc: See next page

Mr. Matthew F. Letany

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**Wyle Laboratories  
Norco Facility  
DTSC 6-23-05 Comments/Response to ENVIRON and Wyle's 6-10-05 Draft Presumptive Removal Action Workplan  
for Soil Gas at The Northwest Area  
Wyle Laboratories, Norco, California**

DTSC Comment	ENVIRON and Wyle Response	DTSC's response to Wyle's response to comments
<b>GENERAL COMMENTS:</b>		
<p>1. SVE (Soil Vapor Extraction) operation proposed in the RAW is contingent upon groundwater depth in the Northwest area. Since all of the SVE wells screens are planned below 10 ft. bgs, the groundwater depth has to recede to at least 15 ft. below ground surface (bgs) before the SVE can be operational. The drop in groundwater levels may take longer than expected in which case implementation of SVE system may be delayed.</p>	<p>As discussed during our May 20, 2005 meeting with DTSC, shallow ground water depth at the Northwest Area may indeed cause delays to implementation of SVE, DTSC's preferred remedial alternative. Technical limitations of SVE technology at the Northwest Area (including potential delays due to shallow ground water levels) were brought to the attention of DTSC prior to submittal of the Presumptive RAW. Despite these limitations, DTSC requested ENVIRON and Wyle to abandon the proposed chemical oxidation of TCE in ground water by permanganate injection (as presented in ENVIRON and Wyle's, <i>Draft Removal Action Workplan for Ground Water at the Northwest Area</i>, submitted to DTSC on March 1, 2005), in favor of SVE technology as presented in the Presumptive RAW.</p> <p>With that said, the maximum planned depth of SVE extraction wells is 10 feet, as stated on pages 28 and 29 of the Presumptive RAW. Historically, the depth to ground water in the Northwest Area was on the order of 12 to 15 feet below ground surface (bgs), sufficiently deep to allow operation of the planned SVE wells. In April, ground water levels had risen to approximately 4 to 5 feet bgs. Since that time, water levels have steadily declined and are now 6 to 7 feet bgs. Further decline is expected as the summer proceeds. Ultimately, barring another very wet winter, water levels should decline to a depth that will allow operation of the SVE system.</p>	<p>DTSC did not ask Wyle to abandon the proposal for chemical oxidation of TCE. In situ chemical oxidation needs to be bench tested/pilot tested before it can be used as a remedy. Since the RAW needed to be implemented on an expedited schedule, it was necessary that a proven remedy, like soil vapor extraction, be selected. If Wyle wishes, it can separately propose bench test followed by pilot test through work plan/tech memos.</p> <p>With regards to the RAW, DTSC recommends that Wyle must not wait until water level recedes to 12 ft bgs. The proposed SVE should be implemented immediately once the RAW is approved so that potential exposure to indoor can be minimized. DTSC and Wyle can reevaluate the screen depth of the SVE wells at a time of installation.</p> <p>It is necessary that some of the SVE wells be closer to the impacted or potentially impacted residences and be installed with screens shallower than 5 ft bgs (For example, the screen 3 ft to 8 ft bgs) so that effect of groundwater level fluctuations in the future can be minimized during installation/operations of SVE around the residences. .</p>
<p>2. Since DTSC requires that the remedial action objective(s) stated in the RAW be achieved, SVE wells should be installed at shallower depth (less than proposed 15 feet) so that operations of the proposed SVE system can be expedited. As water levels recede, Wyle may propose to install additional deeper SVE wells in the future. For the shallow SVE wells, Wyle may evaluate shallow horizontal and/or vertical SVE wells.</p>	<p>As stated on pages 28 and 29 of the Presumptive RAW, Wyle intends to screen SVE wells from approximately 5 to 10 feet bgs to address VOCs in shallow soil gas at the Northwest Area and to minimize the possibility of shallow ground water levels hindering implementation of the proposed remedial action. Screen depths will be discussed further in the Operation and Maintenance (O&amp;M) Plan for the proposed</p>	<p>Refer to above comment.</p> <p>DTSC is still recommending a few shallower SVE wells close to the residents.</p>

		<p>SVE system, to be prepared under separate cover per the schedule presented on Figure 6 of the Presumptive RAW (lines 10 and 11).</p> <p>Horizontal wells were considered but not selected because a) many more horizontal wells than vertical wells would have to be installed to achieve an equivalent radius of influence covered by the proposed vertical wells, b) due to the heterogeneous formation and changes in elevation in the bedrock surface, installation of long horizontal wells is more problematic (e.g., more prone to encountering refusal) than installation of vertical wells, c) due to the presence of subsurface utilities in proximity to each home, installation of long horizontal wells increases the probability of inadvertent utility damage when compared to vertical wells; and e) vapor extraction through long horizontal wells from approximately 5 to 7 feet bgs would have a higher possibility of short-circuiting to the surface due to installation under lawns and gardens than vertical wells installed under pavement (e.g., asphalt or concrete).</p>	
3.	<p>The RAW should include contingency in case SVE system cannot be implemented because of high groundwater levels. The contingency may include modification/expansion of the proposed SVE and/or application of other technology. If SVE cannot be implemented, it may be necessary to conduct indoor air quality sampling in the homes to evaluate exposure from indoor air and the need for increased ventilation via HVAC system.</p>	<p>There are no remedial technologies that meet the remedial action objectives (RAOs) and address only soil gas, as discussed in Sections 4.0 and 5.1 of the Presumptive RAW. Wyle prepared a Draft RAW for mitigation of TCE in ground water, the recognized source of TCE in soil gas at the Northwest Area, which was submitted to DTSC on March 1, 2005. This Draft RAW proposed to, (1) reduce the concentration of VOCs in ground water through injection of permanganate, and (2) control vapor partitioning of VOCs from ground water and therefore reduce potential exposure via the indoor air pathway. Wyle believes this is a viable alternative to the Presumptive RAW remedy. However, in a letter dated April 11, 2005 and during the May 20, 2005 meeting, DTSC rejected this remedy and expressed a preference for SVE technology; as a result, Wyle prepared the Presumptive RAW. If SVE cannot be implemented in the Northwest Area, Wyle will revert to its original proposal.</p> <p>As mentioned in Section 3.2 of the Presumptive RAW, Wyle conducted indoor air quality (IAQ) sampling in October of 2004 at the three residences located in proximity to the highest detected soil gas concentrations. The results of the IAQ sampling indicated vapor intrusion in only one home, which was mitigated through installation of a new HVAC system. In April of 2005, when water levels were at their highest recorded levels (4 to 5 feet bgs), Wyle repeated the</p>	<p>In situ chemical oxidation needs to be bench tested/pilot tested before it can be used as a remedy. If Wyle wishes, it can separately propose bench test followed by pilot test through work plan/tech memos.</p> <p>Due to the time constraint and urgency for the implementation of the RAW, a proven technology like SVE is selected.</p> <p>DTSC agrees that the modification of the system will be based on the monitoring results.</p> <p>DTSC will further comment on the soil gas/IAQ monitoring scope/schedule after the review of Operation and Maintenance Plan (O&amp;M Plan). DTSC expects broader soil gas sampling by installing additional soil vapor probes in the northwest area (beyond the area proposed for the RAW) on Goldenwest Lane. It is important to conduct soil gas/IAQ sampling to assess potential exposure and to better define the area that can be addressed by the SVE.</p>

		<p>IAQ sampling in the three homes. Sampling results indicated the absence of vapor intrusion in all three homes (the HVAC system in the one home proved effective in mitigating vapor intrusion). On June 6, 2005, DTSC informed the residents of the results of the IAQ sampling and stated "the levels detected do <u>not</u> pose a threat to human health, either immediate or long term." Based on these results, no additional IAQ sampling is deemed necessary at this time other than ongoing quarterly monitoring conducted at 2281 Golden West Lane. The Presumptive RAW was prepared as an interim remedial measure (IRM) at the request of DTSC, not as a result of vapor intrusion.</p> <p>The Presumptive RAW includes the installation of six nested vapor probes, which will be monitored <u>in addition to</u> the existing five nested vapor probes during operation of the proposed SVE system (refer to Section 7.3.2). Data generated during the monitoring events will be used to gauge system performance and evaluate the need for system modification or additional sampling (i.e., IAQ sampling). This will be discussed further in the O&amp;M Plan for the proposed SVE system, to be prepared under separate cover per the schedule presented on Figure 6 of the Presumptive RAW.</p>	
4.	<p>Wyle plans to install nine SVE (Soil Vapor Extraction) wells. However, design parameters such as radius of influence (ROI), flow versus applied vacuum data for optimizing the system are unknown.</p> <p>It is difficult to understand how the wells are configured in the absence of radius of influence information. The radius of influence data along with the flow versus applied vacuum data should be collected initially with one extraction well so that the SVE well network can be appropriately configured.</p>	<p>As mentioned in the response to Item 2 above and discussed in Section 7.3, the Presumptive RAW was prepared at the request of DTSC, and was intended as an IRM to reduce the potential for indoor air intrusion to residences at the southern terminus of Golden West Lane in the Northwest Area.</p> <p>The lack of information regarding the ROI was discussed during the May 20, 2005 meeting. At that time, the agency indicated it would forgo a pilot test in favor of expediting remediation implementation. Therefore, Wyle based the spatial orientation of wells on historic soil gas results. An estimated ROI of 30 feet was used. This estimate was considered reasonable based on professional experience and the nature of subsurface soils (alluvium and weathered granitic rock mass), as evidenced during recent and past subsurface investigations at the Northwest Area. Installing only one well, collecting this information and then remobilizing to install more extraction wells and piping will result in delays in implementation.</p> <p>SVE design was completed based on existing data and professional experience, which is consistent with DTSC's desire to expedite implementation of an IRM at the Northwest</p>	<p>DTSC does not recall discussion on omitting pilot test during the meeting with Wyle on May 20, 2005. Nevertheless, the ROI should be verified during the SVE startup. The procedure to verify ROI should be included in the revised RAW.</p>



		Area, and thus mitigate soil gas in an expeditious manner. See Section 7.3 of the Presumptive RAW.	
5.	<p>The SVE wells installed will be 10 ft bgs (below ground surface). However, the geological formation below 10 ft bgs may consist of decomposed granite bedrock and competent granite bedrock that will have low air permeability limiting the effectiveness of the SVE. If possible, all the extraction wells should be placed in alluvial fan deposits instead of decomposed granite bedrock and competent granite bedrock to optimize the SVE.</p>	<p>Based on recent and past subsurface activities at the Northwest Area, subsurface soils are known to consist of alluvium, colluvium, and decomposed in-place granitic mass (refer to Section 2.3). Based on field experience, it is not considered likely that competent granitic bedrock will be encountered during drilling of the nine SVE wells, which have an intended total depth of 10 feet bgs. In addition, given the thickness of alluvial deposits on Golden West Lane (approximately 5 feet or less), it will not be possible to install SVE extraction wells solely in alluvial materials.</p> <p>The O&amp;M Plan for the proposed SVE system, to be prepared under separate cover per the schedule presented on Figure 6 of the Presumptive RAW (lines 11 and 12), will include details pertaining to SVE well installation, including contingency procedures for the potential encounter of decomposed or competent granitic bedrock.</p>	Wyle's response is adequate.
6.	<p>The RAW should elaborate on SVE design and should include:</p> <ul style="list-style-type: none"> <li>• Process Flow Diagram (PFD) with sampling points;</li> <li>• Equipment Specifications for major components such as blower/vacuum pump, carbon adsorption vessels, etc.</li> </ul>	A PFD has been prepared for the proposed SVE system and is included as Figure 7 of the Presumptive RAW. The PFD is referenced, as appropriate, in Section 7.0 of the Presumptive RAW. The O&M Plan for the proposed SVE system, to be prepared under separate cover per the schedule presented on Figure 6 (lines 11 and 12) of the Presumptive RAW, will include equipment specifications for the major components, as requested by DTSC.	Wyle's response is adequate
7.	The RAW should include Operation and Maintenance (O&M) plan. The O&M plan should also include the procedure for regular continuous SVE operation, rebound measuring, SVE operation in pulse mode and SVE closure criteria.	Wyle completed a RAW addressing the central portion of the Site in May 2004, which currently is being implemented. During preparation and approval of the previous RAW, DTSC and Wyle agreed that an O&M Plan would be prepared under separate cover. When preparing this Presumptive RAW, Wyle followed this same, previously approved procedure, and included preparation of an O&M Plan according to the schedule presented on Figure 6 (lines 11 and 12). The O&M Plan will be prepared after the RAW is approved, during DTSC's CEQA process. The O&M Plan will include details regarding SVE system start-up, monitoring, and cessation.	<p>Wyle's response is adequate.</p> <p>As mentioned in the comment for response to previous comment 2, DTSC will review and provide comments on O&amp;M plan.</p>

8.	<p>The RAW anticipates O&amp;M (Operation and Maintenance) cost for <u>one</u> year only. However, the O&amp;M duration depends <u>on</u> achieving cleanup goals and efficiency of the SVE system. The RAW should define the cleanup goal for each COC (chemical of concern). The O&amp;M cost should be included at least for three years.</p>	<p>As mentioned in the response to Items 2 and 3 above, the Presumptive RAW was prepared at the request of DTSC, and is intended as an IRM to reduce the potential for indoor air intrusion to residences at the southern terminus of Golden West Lane in the Northwest Area. As discussed during the May 20, 2005 meeting, the RAO (see page E-1 and Section 4.1, page 16) is to <u>reduce the potential</u> for indoor air intrusion, not to remediate COCs to specific levels. This will be addressed by comprehensive site-wide remediation to be implemented following further investigation activities at the Northwest Area and preparation of a comprehensive risk assessment, with will be used to establish remediation goals for all media and all COCs.</p> <p>Based on the current schedule for the RI (June 30, 2005), FS and RAP, site-wide remediation can be implemented toward the end of 2006, therefore, a 12-month operation schedule was considered reasonable. However, if necessary the SVE system can be operated for periods longer than 12 months. No changes to the O&amp;M cost are required.</p>	<p>DTSC requested preparation of a RAW to address potential exposure to indoor air for residents on Goldenwest Lane.</p> <p>DTSC acknowledges the remedial goal is to reduce the potential for indoor air intrusion from VOCs.</p> <p>Risk calculated from the soil gas in shallow vapor probes and indoor air monitoring data should be used in making decisions regarding cessation of SVE or achieving cleanup goal. DTSC expects inclusion of this in O&amp;M Plan.</p> <p>See response to comment #3 regarding additional sampling on Goldenwest Lane.</p>
9.	<p>The RAW O&amp;M should also include frequent indoor air monitoring from the affected residences to verify the mitigation of the exposure risk.</p>	<p>As mentioned in the response to Item 2, based on IAQ sampling results for October 2004 and April 2005, no other IAQ sampling is planned nor is additional IAQ sampling deemed necessary at the Northwest Area at this time. The Presumptive RAW was prepared as an IRM at the request of DTSC, not as a result of vapor intrusion.</p>	<p>Refer to above comments.</p> <p>The original PDF response included baseline IAQ sampling. However, the response forwarded does not include baseline IAQ sampling. Please clarify. Wyle should include soilgas/ IAQ sampling.</p>
<b>SPECIFIC COMMENTS:</b>			
1.	<p><u>Section 7.3.3.:</u> This section should clearly state how groundwater level fluctuations affect the installation/operation of the SVE system.</p>	<p>As discussed with DTSC during the May 20, 2005 meeting, prior to submittal of the Presumptive RAW, the depth to water will affect the startup and performance of the SVE IRM requested by DTSC. At a minimum, it is anticipated that ground water levels</p>	<p>As commented for response for comment 1, it is necessary that some of the SVE wells are located closer to the impacted or potentially impacted residences should be installed with screens shallower than 5 ft bgs (For example, the screen 3 ft to 8 ft bgs)</p>



	The piping between the SVE wells and SVE system will be a standard 2" diameter PVC. The pipe diameter appears small. Please verify the pipe diameter for the system flow and vacuum requirement.	will need to be approximately 12 feet bgs in order for removal action implementation.  Wyle conducted gauging of monitoring wells during June 2005. Table 1 has been updated to include this information; text in Sections 2.3.4 and 7.3.3 has been updated accordingly. As indicated in the table, maximum ground water elevations were in April 2005 and has declined steadily since that time.	so that effect of groundwater level fluctuations in the future can be minimized during installation/operations of SVE around the residences.
		Based on professional experience, 2-inch diameter PVC piping will be sufficient for the SVE system design proposed in the Presumptive RAW.	Wyle's response is adequate
2.	Attachment D3: Section 2.1 mentions SVE casing of 2-inch diameter. However, the Figure shows 4-inch diameter casing. Clarify the diameter of the well casing.	Comment noted. The Figure has been revised to reflect the text.	Wyle's response is adequate
<b>6-23-05 RONALD OKUDA, R.G. Staff Geologist, Geological Services Unit-Cypress Office</b>			
<b>GENERAL COMMENTS:</b>			
1.	As the groundwater table recedes, water will still be trapped in the soil interstitial pore spaces and an initial higher vacuum may be necessary to open up the porosity. Care should be taken not to create a short circuit of the vacuum to the surface atmosphere.	Comment noted. Care will be taken to avoid short-circuiting of the SVE system.	Wyle's response is adequate.
	Some of the proposed extraction well locations appear to be located under concrete driveways and other impermeable soil covers. The screen depth of probes in those locations could be shallower to avoid being installed in saturated soils. In those locations where there are no surface coverings, the work plan should address potential short-circuiting.	The amount of impermeable surface cover is considered small relative to the total surface area to be addressed by the proposed SVE system. Therefore, in order to minimize the potential for short-circuiting; the top of the SVE well screen will be no shallower than 5 feet bgs.	The short-circuiting can be easily addressed by placing plastic sheeting/membrane on the surface. Wyle should ensure that short-circuiting be minimized.

2.	<p>If the residents are excessively watering their vegetation, especially around the house foundation, the water may fill the pore spaces in the soil, blocking airflow in the subsurface. This should be considered during design and placement of the soil vapor extraction probes.</p>	<p>Comment noted; however, excessive watering of vegetated cover is not considered a significant technical constraint to design of the SVE system. Furthermore, the majority of SVE extraction wells are located in areas not submitted to irrigation (e.g. below driveways, at or near property boundaries). In consideration of the large area to be treated by the SVE system, potential blockage of airflow due to saturated pore space due to watering is not considered a limiting factor.</p>	<p>Wyle's response is adequate.</p>
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P:\W\Wyle Labs\Norco\Presumptive RAW\DTSC Comments\Comments TABLE to 6-10-05 Draft P-RAW - BT02.doc

## NOTICE OF EXEMPTION

**To:** Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044, 1400 Tenth Street, Room 212  
Sacramento, CA 95812-3044

**From:** Department of Toxic Substances Control  
Site Mitigation and Brownfields Program  
5796 Corporate Avenue  
Cypress, CA 90630

**Project Title:** Wyle Laboratories, Inc. Removal Action Workplan for Soil at the Northwest Area

**Project Location – Specific:** 1841 Hillside Avenue

**Project Location – City:** Norco

**Project Location – County:** Riverside

### Description of Project:

#### Project Background:

The Wyle Laboratories site (Site) consists of approximately 429 acres in an area that is primarily rural residential. (Figure 1) An ephemeral stream runs through the Site in an east-west direction and exits the Site towards the southwestern corner. Surface water, present in the stream during and after rainfall events, flows generally from east to west in the stream channel. Groundwater at the Site is generally encountered within few feet below ground surface.

The site is divided geographically into several areas identified by letters (Figure 2). Each area typically consists of one or more small buildings, structures and/or outdoor testing area built for certain testing procedures and to house specific testing apparatus. The Site has been used as a testing facility (environmental and dynamic simulation) that services the defense, aerospace and manufacturing industries. Systems and components tested include pumps, valves, piping, electronic equipment, propulsion systems and ordinance and weapons systems.

Environmental investigation conducted on the site with the oversight of the Regional Water Quality Control Board (RWQCB) revealed that Wyle operation resulted in soil and groundwater contamination with contaminants primarily concentrated in Area F of the Site. The groundwater is contaminated with volatile organic compounds and explosives residue (perchlorate and NDMA).

RWQCB transferred the lead oversight role on this Site to the Department of Toxic Substances Control (DTSC) in mid-2003. DTSC entered into a consent order with the responsible parties for investigation and cleanup of the Site in October 2003. In addition, an Interim Removal Action Workplan (RAW) to contain and control groundwater contamination in Area F was approved and implemented in mid-2004.

Additional environmental investigations conducted on and offsite with the oversight of DTSC revealed that Wyle operations resulted in groundwater and soil contamination in the northwest area of the Site. The groundwater and soil is contaminated with volatile organic compounds (VOCs). A Presumptive Removal Action Workplan to control soil vapor contamination in the northwest area has been prepared. Final cleanup standards for the site have not yet been developed and are subject to subsequent approval by DTSC.

#### Project Activities:

The Interim RAW, prepared in accordance with Health and Safety Code Section 25356.1(h) (1), includes soil vapor extraction and treatment in the northwest area of the Site. Six vapor monitoring wells will be installed on the street and near residences in the vicinity of the existing vapor monitoring wells.

Soil Vapor extraction using a high vacuum system will be conducted from nine offsite proposed extraction wells, SVE-1 through SVE-9 (Figure 3), to extract the VOC-impacted soil vapor. One skid- or trail-mounted treatment unit will be installed on-site near the extraction/ remediation wells and operated. The treatment unit

will consist of two 1,000-pound vapor phase Granular Activated Carbon (GAC) vessels, installed in series to treat the extracted vapor. Soil Vapor monitoring will be conducted at several locations upgradient, within and downgradient from the impacted zone to ensure that removal action objectives are met.

Treated soil vapors from the soil vapor extraction system will be discharged to the atmosphere under South Coast Air Quality Management District permit. This will be an interim removal action until the site has been fully characterized and a final remedy is selected.

**Name of Public Agency Approving Project:** California Environmental Protection Agency,  
Department of Toxic Substances Control

**Name of Person or Agency Carrying Out Project:** Environ International Corporation on behalf of Wyle  
Laboratories, Inc.

**Exempt Status:** (check one)

- ☐ Ministerial (Sec. 21080(b)(1); 15268);  
☐ Declared Emergency (Sec. 21080(b)(3); 15269(A));  
☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));  
☐ Categorical Exemption. State type and section number: \_\_\_\_\_  
☐ Statutory Exemptions. State code number: \_\_\_\_\_  
☒ General Rule (Sec. 15061(b)(3))

**Exemption Title:** With Certainty, No Possibility of a Significant Environmental Effect

**Reasons Why Project is Exempt:**

The RAW includes soil vapor extraction and treatment near the northwest boundary of the site for cleanup of VOCs in soil. The site is on the Hazardous Waste and Substances Sites List (pursuant to Government Code Section 65962.5) and can be seen with certainty, no possibility of significant environmental effect.

The project will not have not have the possibility of significant effect on the environment because:

1. The nearest offsite residential receptor to the work area is more than 300 feet from the nearest extraction and treatment equipment. This will provide adequate distance from an exposure to noise or potential chemical exposure from the extraction and treatment activity. The air blower for the treatment unit will consist of a silencer that will reduce noise levels. The Site is fenced with entrance through a manned guard gate in the southwestern corner of the property.
2. There will not be significant new construction in the offsite area and work areas of the Site are largely developed areas. Controls stated in item 5 below will assure that habitat in the vicinity is protected.
3. The treatment will be located in secondary containment areas and will be near the extraction wells. The well systems will include built-in alarms and shutdown mechanisms if there is a problem with the treatment system. An alarm and notification system will be triggered if the treatment system is shut down or loses power. At the concentrations extracted, the compound vapors extracted do not pose a risk of fire or explosion since they are neither flammable nor combustible. The system will be inspected for integrity periodically and influent and effluent will be sampled on a regular schedule to assure the system's efficiency, identify the need to replace carbon units, and verify compliance with discharge requirements.
4. The treatment unit does not involve thermal oxidation units. The carbon treatment units will require an air permit from the South Coast Air Quality Management District. The South Coast Air Quality Management District conducts health risk assessment with dispersion modeling to calculate effluent concentration limits. Effluent standards have been set, based on the modeling, to assure that concentrations released from the carbon system into the air will not exceed levels that pose a  $1 \times 10^{-6}$  (one in a million) cancer risk to the residents. Air discharge from the system will be sampled on a regular basis to ensure no significant level of hazardous constituents is released.
5. To ensure no impact upon biological resources will occur from the installation and operation of the soil vapor extraction, treatment and monitoring systems:

- The ephemeral stream onsite is approximately 2,100 feet from the treatment unit, and therefore would not affect any sensitive biological receptors.
- Drilling of soil vapor monitoring wells will be conducted in fully developed areas and areas developed for residential use.
- The drilling rig will be kept within the existing city streets in order to avoid impacts to sensitive biological resources.
- Encroachment and/or right of way permits will be obtained from the City of Norco prior to installing wells on public roads.
- Native vegetation will not be removed for the purpose of installing new monitoring wells, treatment equipment, or pipeline.

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Juan Osornio

Lead Agency Contact Person

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( 714 ) 484-5498

Phone #

**DRAFT**

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DTSC Branch Chief Signature

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Date

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Peter A. Garcia

DTSC Branch Chief Name

Cypress Schools Branch

School Prop. Eval. and Cleanup Division

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DTSC Branch Chief Title**TO BE COMPLETED BY OPR ONLY****Date Received For Filing and Posting at OPR:** \_\_\_\_\_



FIGURE 1

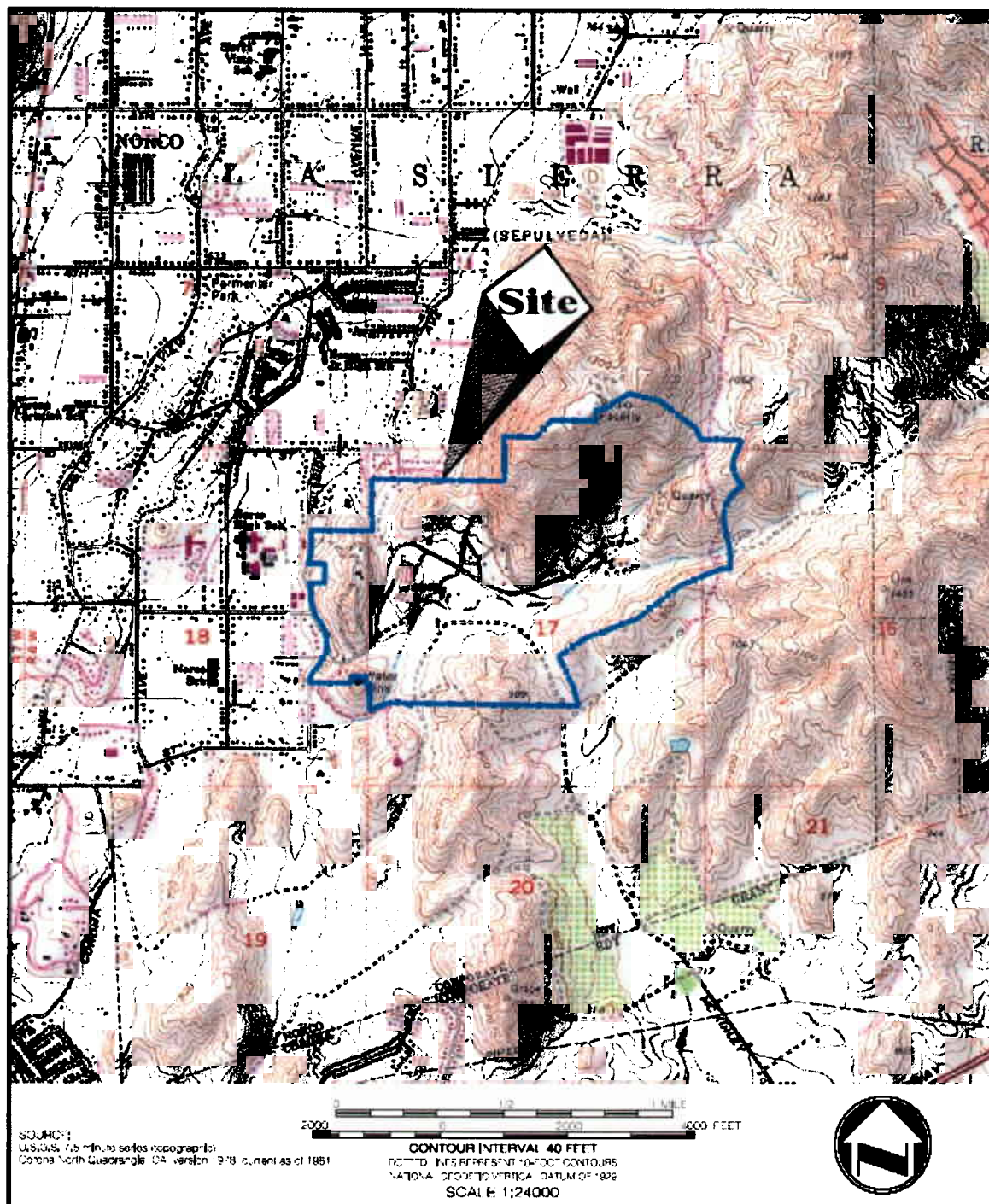


FIGURE 2

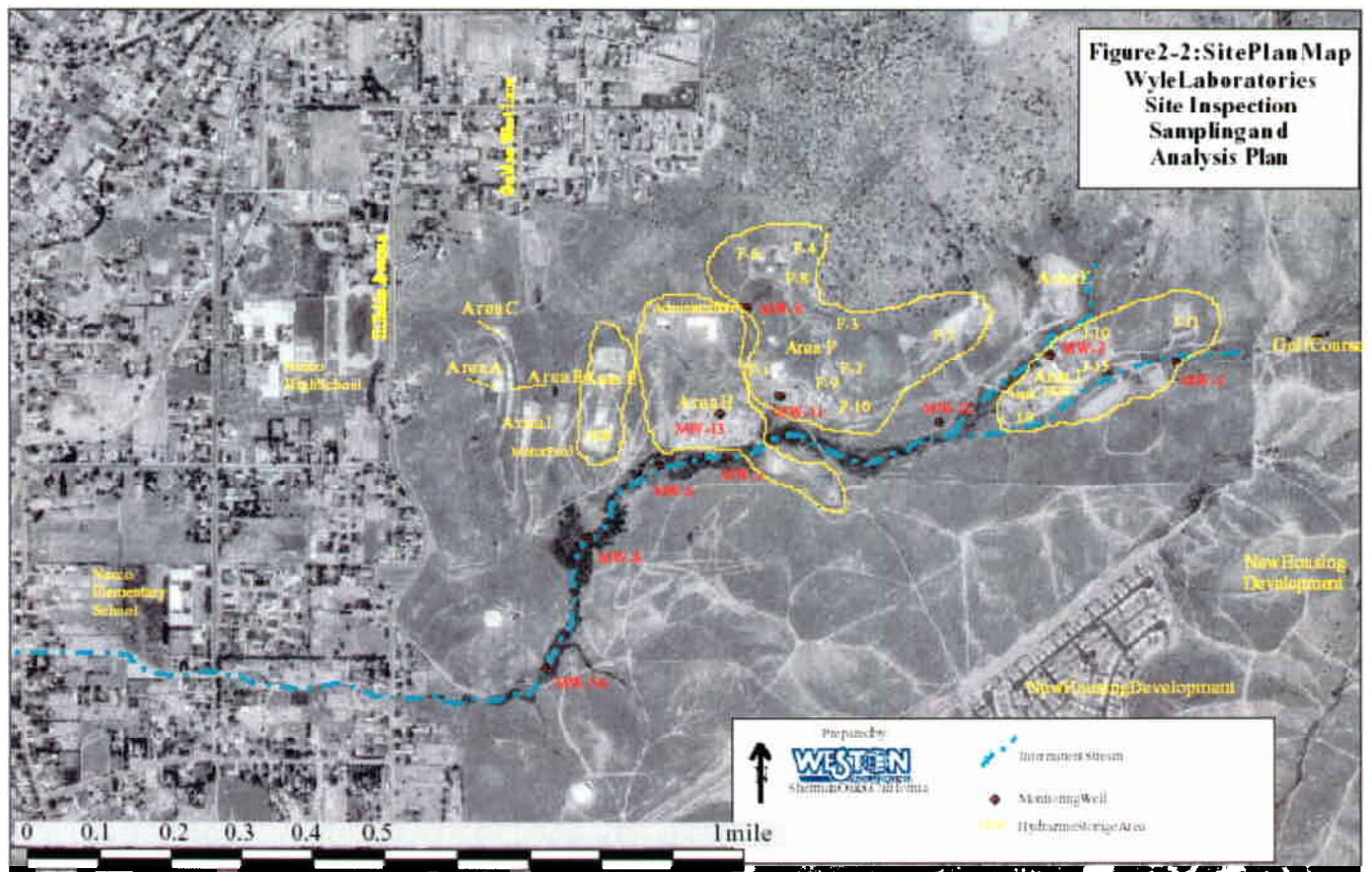




Figure 3

